

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

GARY EUGENE LOTT

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-
CHRISTOPHER LANCE SHEEHAN, ESQUIRE;
EUGENE C. GRIFFIN, Circuit Court Judge;

SOLICITOR DAVID M. STUMBO (new) 8th Circuit
Solicitor (2013) GREENWOOD COUNTY;

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Elizabeth WHITE (Ass. Solicitor 8th Circuit GREENWOOD COUNTY); CITY OF GREENWOOD; GREENWOOD COUNTY, SOUTH CAROLINA IN Their INDIVIDUAL, OFFICIAL and/or COLLECTIVE Capacity

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: Yes No
(check one)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Gary Eugene LOTT</u>		
Street Address	<u>1729 Fruithill Road</u>	<u>GCDC</u>	
City and County	<u>Saluda, SC 29138</u>	<u>528 Edgefield Street</u>	
State and Zip Code	<u>Greenwood, SC 29646</u>		
Telephone Number			

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Eugene C. Griffin, Jr.</u>		
Job or Title	<u>Circuit Court Judge</u>		
(if known)	<u>1226 College Street</u>		
Street Address			
City and County	<u>Newberry, SC 29108-2757</u>		
State and Zip Code			
Telephone Number			

Defendant No. 2

Name	<u>David Stumbo</u>		
Job or Title	<u>8th Cir. Solicitor</u>		
(if known)	<u>600 Monument Street, Ste. 205</u>		
Street Address	<u>POB 516</u>		
City and County	<u>Greenwood, SC 29649</u>		
State and Zip Code			
Telephone Number			

Defendant No. 3

Name	<u>Elizabeth WHITE</u>		
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Job or Title (if known)	<u>Ass. Solicitor</u>
Street Address	<u>Same as No. 2 Defendant</u>
City and County	<hr/>
State and Zip Code	<hr/>
Telephone Number	<hr/>
Defendant No. 4	
Name	<u>Christopher Lance SHEEK</u>
Job or Title (if known)	<u>EQUIVA</u>
Street Address	<u>4 McGee St.</u>
City and County	<u>Greenville, Greenville</u>
State and Zip Code	<u>SC 29601-2256</u>
Telephone Number	<hr/>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C.A. 1983, 1988, 1985, & 2000

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

X

The plaintiff, (name) Gary Eugene LOTT, is a citizen of the State of (name) South Carolina.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

X

The defendant, (name) Christopher Lance SHEEK, a citizen of the State of (name) South Carolina. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I

The defendants STUMBO, SHEEK, GRIFFIN and WHITE subjected Lott to due process of law violation on or about 2.25.13; specifically in the (formal) charge(s) (indictment # 2013-GS-24-0305)(see also 2013-GS-24-0101; CSC 3rd) (date of offense 10.3.11); he was tried where the Court and government official(s) did not have jurisdiction to proceed

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Lott urges the Court to grant declaratory, injunctive and damages actual, nominal and punitive damages herein in excess of forty (40) million dollars;

on or about 2-25-13. Here, the trial jury acquitted of the major offense(s) CSC 1st. (Tr. pp. 335-336)

Anyway, Lott was convicted on the lewd act offense on or about 2.28.13—the appeal(s) (directly) is still pending where he is being denied due process of law in the State Court(s);

He filed motion(s) in the state trial court(s) on or about 10.3.14 where there appears (must) be a conspiracy by defendants to deny due process of law (in the nature of Motion to Arrest Judgment and/or Vacate conviction and sentence on jurisdictional ground);

II.

CIVIL COMMITMENT AFTER RELEASE

Plaintiff was recently released on re-entry law(s), subjected to ankle monitoring law(s) etc. when on or about 3.2.19 @ 2 pm Lott was arrested by Saluda Law Enforcement Official(s) (Sheriff's Office); subsequently transported to Greenwood County Detention Center where he was subjected to a probably cause order (issued 2.6.19 (filed 2.14.19) (case # 2019-CP-24-00029) in violation of the 4th and 14th Amendments of the United States Constitution (arrest & due process violation);

III.

Judge Eugene C. Griffin, Jr., should have disqualified himself on his own motion where he knew or should have known the lewd act offense which defendant(s) utilized is null and void and currently on/in direct appeal where due process right(s) are violated constantly against Lott. Again defendant(s) engages act(s) of cel-lusien, in concert action(s) to deprive Lott of his constitutional right(s) due process and/cruel and unusual punishment under color of state law(s);

IV.

Since Lott was incarcerated the pattern has been laid by Stumbo of continuing to bring more and more false charges(s) against Lott of the CSC nature; all of which were dismissed, nolle prosequi between 2014 and 2019 by and through Greenwood County which is why Greenwood City/ Greenwood County and Sheek are subjected to action for damages (actual, nominal and punitive damages herein)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: MAR. 27, 2019

Signature of Plaintiff


GARY EUGENE LOTT

Printed Name of Plaintiff

B. For Attorneys

Date of signing: _____, 20 ____.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address
